

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION

Lloyd Bell, Individually and as Executor of the Estate :  
of Betty Whitley Bell, Deceased :  
: Plaintiffs, : File No.: 1:17-cv-00111  
: vs. :  
American International Industries Inc., et al. :  
: Defendants.

**PLAINTIFF'S MOTION FOR BRIEF EXTENSION OF EXPERT DISCLOSURE**  
**DEADLINE IN LIGHT OF CORONAVIRUS (COVID-19)**

COMES NOW Plaintiff and moves the Court for an Order granting a 14 day extension of Plaintiff's deadline to disclose expert witnesses in light of Coronavirus (COVID-19), and in support thereof would respectfully show the following:

1. This wrongful death case is set for jury trial beginning January 4, 2021.  
2. Plaintiff's current deadline for expert disclosures is March 31, 2020.  
3. On March 3, 2020, the Court entered an Order [Doc. 109] granting in part the Joint Motion of Plaintiff and Defendants to extend expert disclosure and discovery deadlines. The Court expressed concern about any further extensions of time that would affect the dispositive motions deadline of June 30, 2020. Plaintiff would show that the brief extension requested herein would not impact the dispositive motions deadline or any other deadlines in this case.

4. Since March 3, 2020, the spread and impact of the Coronavirus have accelerated rapidly. The office of Plaintiff's counsel in Dallas, Texas, has been closed since March 17, 2020, with employees instructed to work from home. Further, on March 23, 2020, Dallas County issued a countywide shelter-in-place order that remains in effect. The office of Plaintiff's counsel remains in operation, continuing to work remotely on this case and other legal matters. However, logistical and technological challenges have had a negative effect. Additionally, stay-at-home policies arising from the Coronavirus have also affected Plaintiff's experts.

5. Nonetheless, Plaintiff's counsel has continued to work diligently on this case, and Plaintiff has already produced some expert reports to Defendants' counsel. However, in light of the Coronavirus and its impact, Plaintiff needs a brief extension of time to fully disclose his experts and produce the remaining expert reports, which are still being completed by Plaintiff's experts.

6. Accordingly, Plaintiff requests that the Court enter an Order granting Plaintiff a 14 day extension of time to April 14, 2020, to disclose Plaintiff's retained expert witnesses under Rule 26(a)(2)(B) and any expert witness under Rule 26(a)(2)(C).

7. Plaintiff would show that this 14 day extension of time would not delay the completion of expert discovery by the deadline of June 15, 2020, and would not delay the dispositive motion deadline of June 30, 2020.

WHEREFORE, Plaintiff respectfully requests that the Court for an Order extending the time for Plaintiff to disclose his retained expert witnesses under Rule 26(a)(2)(B) and any expert witness under Rule 26(a)(2)(C) to April 14, 2020.

Respectfully submitted,

/s/Frank J. Wathen  
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*Local Civil Rule 83.1 Counsel*

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 31, 2020, Plaintiff served a Motion for Brief Extension of Expert Disclosure Deadline In Light of Coronavirus (COVID-19), via CM/ECF filing upon all counsel of record in the above-referenced matter.

*/s/Frank J. Wathen*  
Frank J. Wathen